

# **EXHIBIT 27**

US District Court - Delaware  
Chapter 11 - W.R. Grace

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Gordon McAlpine Bragg

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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CHAPTER 11

IN RE:  
W.R. GRACE & CO., et al.  
Debtors.

Case No. 01-1139 (JFK)  
Jointly Administered

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DEPOSITION OF  
Gordon McAlpine Bragg  
September 19, 2007  
Toronto, Ontario, Canada  
Lead: Bernard Bailor, Esquire  
Firm: Caplin & Drysdale

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1 MS. AHERN: And I interjected an  
2 objection.

3 BY MR. CUTLER:

4 Q. And to make sure we're all on the  
5 same page, when I refer to the mechanisms in Paragraph  
6 14, you understand that to be the comminution force, the  
7 force to break electrostatic attraction, and the air flow  
8 sufficient to suspend the asbestos?

9 MS. AHERN: And I renew my objection.

10 THE WITNESS: I'm going to answer your  
11 question in two parts.

12 First, in order to perform an exposure  
13 analysis, I need the data that's in this table. I may  
14 possibly not use the second column, which is the basis  
15 for identification; however, I repeat that, as I  
16 mentioned before, the three mechanisms, three physical  
17 mechanisms denote the physics behind what in this  
18 questionnaire will appear as industrial processes.

19 It will, for example, appear in here as  
20 possibly an electrician removed insulation in order to  
21 install a switch box. It will appear as someone who  
22 scraped something off because he wanted to make a hole in  
23 a surface. This will be the way those, that physics  
24 evidences itself. No one will mention in this  
25 questionnaire comminution, adhesion or dispersion. That

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1 is simply a part of my report which explains the physics  
2 behind the rather more practical evidence we need to do  
3 an exposure assessment.

4 So in answer to your question, I need  
5 that table, Part IV. I need parts of it; for example, on  
6 Part IV, Question 8 may be relevant, 9, potentially 10.  
7 On Part V... I'm sorry, I can't... I can't do it. I  
8 can't read the dark one, but certainly I would be  
9 astonished if I didn't need that material, even though I  
10 don't know what it is.

11 MS. AHERN: Just let the record reflect  
12 that the copies that we're looking at on page 11 have a  
13 box chart where again, the copy quality prevents him  
14 reading the titles on the columns.

15 BY MR. CUTLER:

16 Q. Let me help the witness. I believe  
17 that each of these columns is an identical heading to  
18 what we saw in Exhibit 3. I can run through them -- I'm  
19 sorry, not exhibit 3; Part III of Bragg Exhibit 7. The  
20 first column is "Product" --

21 A. If you would make that stipulation,  
22 then I would have the same answer.

23 Q. All right.

24 A. Part VI; that's important for  
25 chronology and duration, and Part VII would not be of